IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

IN THE MATTER OF THE SEARCH OF A U.S. POSTAL SERVICE PARCEL: TRACKING NUMBER 9505 5125 9708 5190 5905 19 CURRENTLY LOCATED AT DULLES PROCESSING AND DISTRIBUTION CENTER AT 44715 PRENTICE DRIVE, DULLES, VIRGINIA 20101 IN THE EASTERN DISTRICT OF VIRGINIA

Case No. 25-sw-622

AFFIDAVIT IN SUPPORT OF APPLICATION FOR A SEARCH WARRANT FOR ONE U.S. MAIL PARCEL

I, Daryea Satterfield, being duly sworn, hereby depose and state:

I. INTRODUCTION

A. <u>Purpose of Affidavit</u>

- 1. This Affidavit is submitted in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a search warrant for one parcel (the "SUBJECT PARCEL") sent via the U.S. Postal Service ("USPS") and further described in Attachment A, which is incorporated by reference. The SUBJECT PARCEL is currently located at the United States Postal Inspection Service ("USPIS") office at the USPS Dulles Processing and Distribution Center ("P&DC"), 44715 Prentice Drive, Dulles, Virginia 20101, which is located within the Eastern District of Virginia.
- 2. I submit that the facts alleged herein provide probable cause to believe that a search of the **SUBJECT PARCEL** will yield evidence, fruits, and/or instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) (possession with intent to distribute and distribution of controlled substances) and 846 (conspiracy to distribute controlled substances).

Your Affiant therefore requests authority to search the SUBJECT PARCEL described in Attachment A for the items described in Attachment B.

The **SUBJECT PARCEL** is identified as follows:¹ 3.

Subject	Express (E), Priority (P), First Class (F), or Registered (R) Tracking ID Number	From:	To:	Current Parcel
Parcel		Name and Address	Name and Address	Location
1	(P) 9505 5125 9708 5190 5905 19	Ellen Moran 18005 lolite Loop San Bernadino, CA 92407	Jose Perez 7501 Prince Cole Ct. APT. 10 Manassas VA 20111	USPS Dulles processing and Distribution Center in Dulles, VA, located in the Eastern District of Virginia

Affiant Training and Experience B.

I am a Postal Inspector with the USPIS and have been so employed since July 2024. 4. I completed a sixteen-week basic training course at the USPIS Training Academy. I have received specialized training in interviews and interrogations, mail theft investigations, prohibited mail such as narcotics, property and evidence handling procedures, workplace violence prevention, field legal training, and confidential informant training. Prior to entering USPIS, I completed twentyfour weeks of training at the Maryland State Police Training Academy in Sykesville, MD from July 2019 to December 2019. From July 2019 to July 2024, I served as a Trooper with the Maryland State Police, where I enforced the laws of the State of Maryland and conducted

observed on the SUBJECT PARCEL.

2

¹ For all of the tables in this Affidavit regarding the **SUBJECT PARCEL**, I have listed the sender and recipient information as it appears on the SUBJECT PARCEL. In other words, the capitalization, punctuation, and spelling of addresses in the table are the same as that which I

numerous investigations to include violations of motor vehicle and criminal laws. During my time with the Maryland State Police, I was certified as a Basic Criminal Investigator where I developed a strong foundation in investigative techniques and tools for solving crimes and conducting criminal investigations. I am currently assigned to the Contraband Interdiction and Investigations Team in Dulles, Virginia, which is responsible for investigations of violations involving the United States Mail, including use of the U.S. Mails to transmit controlled substances, in violation of Title 21, United States Code, Sections 841 and 846.

5. Through my work in law enforcement, I have participated in multiple interdictions, controlled deliveries, seizures, and search warrants that have resulted in criminal arrests and prosecutions. I have become familiar with the manner and means by which narcotics traffickers use U.S. mail and commercial carriers to distribute controlled substances and the proceeds derived from their sale.

C. Sources of Information

6. The facts and information contained in this Affidavit are based on my training and experience, personal knowledge, and observations during this investigation, as well as information provided by other agents involved in this investigation, which I believe to be reliable. All observations that were not made personally by me were related to me by the persons who made the observations. Sources of information used routinely in this process include zip code verification through a public database maintained by the USPS and associations checks between names and addresses in a law enforcement database. The data contained in the law enforcement database assists investigators with identifying information such as: an individual's address(es), phone number(s), email address(es), criminal history, and vehicle registration(s). This Affidavit contains only that information necessary to establish probable cause in support of an application

for the requested search warrant. This Affidavit is not intended to include every fact and matter observed by or made known to agents of the government.

II. PROBABLE CAUSE

A. Background on Factors Indicating Contraband in a Package

- 7. Based on my training and experience, I know that there are suspicious characteristics common to many packages that contain narcotics, controlled substances, or narcotics proceeds (currency), and personal and financial documents related to such proceeds and narcotics. These factors, detailed more fully below, are used as a pointer system to identify packages requiring further investigation.
- 8. As described further below, the **SUBJECT PARCEL** exhibited several of these factors. While there are many characteristics that experienced Postal Inspectors look for, the most common factors or suspicious characteristics routinely observed in the course of screening packages are discussed below.

Suspicious Characteristics

- 9. **Shipping Method:** As alternatives to First-Class Mail, which does not always provide a customer with the ability to track the progress of a parcel through the system, the USPS offers Priority Mail Express and Priority Mail. Drug distributors frequently mail narcotics via Priority Mail Express and Priority Mail to maintain awareness of the package's location.
 - a. <u>Priority Mail Express</u>: Priority Mail Express is guaranteed to be delivered on a set date and time, usually overnight (the deadline is determined at the time of mailing). The customer receives a receipt with this guaranteed information and can opt for a signature requirement when the parcel is delivered. Customers can track the parcel online by its distinct Priority Mail Express tracking number. The weight of the package and the distance

traveled are the two main factors in setting the price. Priority Mail Express costs more than Priority Mail. Businesses using Priority Mail Express typically have a business or corporate account visible on the mailing label, which covers the cost of the mailing, in contrast to the drug distributor who will pay at the counter with cash or a credit card.

- b. Priority Mail: Priority Mail has a delivery service standard of two to four business days, but it is not guaranteed. Priority Mail is a less expensive alternative to Priority Mail Express but still provides the ability to track a parcel. Business Priority Mail Express parcels typically weigh no more than eight ounces, and business Priority Mail parcels typically weigh no more than two pounds. Drug packages often exceed these weights; in my experience, it is fairly easy to separate out smaller parcels, which constitute seventy to eighty percent of all Priority Mail Express and Priority Mail parcels, from other parcels. Address labels on business parcels are often typed, and address labels on drug packages are commonly handwritten. Often, drug traffickers using Priority Mail Express will opt out of the signature requirement.
- c. <u>First-Class Mail</u>: Some individuals mailing illicit narcotics through the USPS are now utilizing both First-Class package service with tracking and First-Class mail without tracking to obscure their illicit activity and to circumvent law enforcement profiling efforts. First-Class packages containing illicit narcotics may weigh less than one pound, or even be mailed in flat envelopes, depending on the type of narcotic involved.
- 10. **Invalid Sender/Return Address:** To distance themselves from parcels containing drugs, drug traffickers often use fictitious or false return addresses and sender names. I have seen numerous packages with invalid sender names, including packages with names of celebrities, cartoon characters, or fictional persona, but more often a search of law enforcement databases

reflect that there is no association between the name of the sender and the address provided. A fictitious or false address can be anything from an incorrect zip code to a non-existent house number or street.

- 11. **Invalid Recipient/Address:** It may appear counter-productive to put the wrong receiving address on a package, but often the named recipient is not associated with the address. This provides plausible deniability to anyone receiving the package as to their knowledge of its contents. Sometimes drug packages are addressed to vacant properties with the expectation that the postal carrier will just leave it at the address. The intended recipient will then retrieve it from that location and hope to remain anonymous.
- 12. **Destination State:** If other criteria are present, I know from experience and training that a domestic package addressed to a "source" narcotics state, which is a state where narcotics often originate, can further indicate that a parcel contains proceeds from the sale of illegal narcotics and/or illegal narcotics. Common source states include Texas, California, and Arizona.
- 13. **State of Origin:** Moreover, if other criteria are present, I know from experience and training that a domestic package sent from a "source" narcotics state, can further indicate that a parcel contains controlled substances.
- 14. **Electronic Postage:** The USPS created electronic postage as a service for frequent mailers and businesses who prefer printing address labels and purchasing postage from their residence or business. In my training and experience, drug traffickers may sometimes create electronic postage accounts as a means of giving legitimate appearance to their drug mailings. In these cases, they typically create the accounts using fictitious account information and often provide pre-paid credit cards, which are difficult to track, as a means of payment. Drug traffickers often use legitimate business return addresses in states other than California, Texas, and Arizona

and other known source states as a means to deter detection, as these other states are not usually considered source states for controlled substances. The postage labels are printed/typed unlike the typical drug related mailing label, which is routinely handwritten.

15. It is my experience that when a combination of the factors outlined above are observed, a drug detection canine will likely "alert" next to the parcel, indicating that they have detected narcotics. Therefore, these factors become a reliable way to profile parcels for additional scrutiny and inspection.

B. <u>Identification of the SUBJECT PARCEL</u>

- 16. On July 14, 2025, the **SUBJECT PARCEL** was intercepted in the Eastern District of Virginia at the USPS Dulles Processing and Distribution Center located at 44715 Prentice Drive, Dulles, VA 20101.
- 17. On July 14, 2025, your affiant placed the **SUBJECT PARCEL** in holding at the USPIS Dulles Domicile located at 44715 Prentice Drive, Dulles, VA 20101.
- 18. As listed in the table below, the **SUBJECT PARCEL** has the following characteristics:

SUBJECT PARCEL					
Priority Express/Priority/Registered/1st Class	(Priority)- 9505 5125 9708 5190 5905 19 DIMENSIONS-12.25" x 12.25" x 6"				
Weight of Parcel	3 lbs. 2 oz.				
Shipping Label	Handwritten				
Sender Name/Address Associated	Not Associated				
Recipient Name/Address Associated	Not Associated				
Signature Requirement	N/A				
Source Area	Yes, California				
Other Suspicious Characteristics	See Below				

- 19. Your affiant reviewed law enforcement database records to conduct a check of the sender address listed on the **SUBJECT PARCEL**, to wit, "Ellen Moran, 18005 lolite Loop, San Bernadino, CA 92407." Your affiant determined the address is a valid address, however no subject by the name of "Ellen Moran" was listed on the address after a check of law enforcement databases. From my training and experience, I know that criminals commonly endeavor to protect their identity from law enforcement by entering a false sender name or false sender return address on the USPS shipping label or omitting information from the sender, recipient, or address.
- 20. Your affiant reviewed law enforcement database records to conduct a check of the recipient address listed for the **SUBJECT PARCEL**, to wit, "Jose Perez, 7501 Prince Cole Ct. APT. 10, Manassas VA 20111." Your affiant determined the address is a valid address, and further inquiry showed no association of "Jose Perez" to the address.
- 21. Other indicia of illicit activity include that the **SUBJECT PARCEL** postage was paid for in cash and with a handwritten label with a waiver of signature. These characteristics together are uncommon in legitimate business parcels, and make it harder for law enforcement to trace the source or recipient of the package, demonstrating a desire to avoid detection.
- 22. Based on the suspicious characteristics described above, this package was presented to a trained police canine for examination on July 14, 2025. Canine Storm and her handler, Fairfax County Police Department Detective Patrick Briant, were utilized to determine whether the **SUBJECT PARCEL** contained illegal narcotics. Standard protocols for canine detection were followed using Canine Storm. Canine Storm was last certified in September 2024 to alert on the odors of marijuana, cocaine (and its derivatives), heroin, MDMA (ecstasy) and

methamphetamine. Canine Storm is trained regularly to ensure the canine's accuracy in the detection of drug odors.

23. The **SUBJECT PARCEL** was placed among other parcels at the USPS P&DC. At that time, Fairfax County Police Department Detective Patrick Briant and Canine Storm were brought in to search the area. The handler observed Canine Storm and then informed me that the dog did alert on the **SUBJECT PARCEL**, which was hidden arbitrarily among other parcels.

III. CONCLUSION

24. I submit that, based on the canine's positive alert, as well as my training, experience, and the characteristics outlined above, there is probable cause to believe that the **SUBJECT PARCEL** contains narcotics or controlled substances and/or materials relating to the distribution of controlled substances through the United States Mail. Therefore, I respectfully request that this Court authorize a search warrant for the **SUBJECT PARCEL**, as described in Attachment A, authorizing the seizure of the items described in Attachment B.

Respectfully submitted,

Daryea Satterfield

Postal Inspector – U.S. Postal Inspection Service

Attested to in accordance with the requirements of Fed. R. Crim. P. 4.1 via telephone on July 16, 2025.

Digitally signed by Ivan Davis Date: 2025.07.16 13:52:35 -04'00'

The Honorable Ivan D. Davis United States Magistrate Judge Alexandria, Virginia

ATTACHMENT A

ITEM TO BE SEARCHED

The **SUBJECT PARCEL** is described as follows:

Subject Parcel	Express (E), Priority (P), First Class (F), or Registered (R) Tracking ID Number	From: Name and Address	To: Name and Address	Current Parcel Location
1	9505 5125 9708 5190 5905 19 (P)	Ellen Moran 18005 lolite Loop San Bernadino, CA 92407	Jose Perez 7501 Prince Cole Ct. APT. 10 Manassas VA 20111	USPS Dulles P&DC in Dulles, VA, located in the Eastern District of Virginia



ATTACHMENT B

Case 1:25-sw-00622-IDD

DESCRIPTION OF ITEMS TO BE SEIZED

- 1. All contents of the **SUBJECT PARCEL** described in Attachment A that relate to violations of 21 U.S.C. §§ 841 and 846 (the "Target Offenses"), including:
 - a. Narcotics or other controlled substances, as well as contraband related to drug trafficking, *e.g.*, packaging materials;
 - b. Any United States currency or other financial instruments that appear to be proceeds related to the distribution or purchase of illegal narcotics;
 - c. Any customer or distributor records related to drug trafficking;
 - d. Any items used to track the contents of the package;
 - e. Business ledgers, lists, and notations relating to drug trafficking;
 - f. Records of a financial nature that suggest how payment for illegal narcotics is conducted; and
 - g. Other evidence of transactions in relation to drug trafficking.